

UNITED STATES DISTRICT
COURT
DISTRICT OF SOUTH CAROLINA

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APR - 9 2018

ANTHONY VALENTINE

PRO SE,

GREENVILLE, S.C.

CASE# 6:17-307-JMC

VS

CLERK TO INSERT CASE#

UNITED STATES OF AMERICA

MOTION TO GIVE NOTICE OF OBJECTION;
TO CAREER OFFENDER ENHANCEMENT
PURSUANT TO 4B1.1 (C)(3) PRESENTENCE REPORT

COMES NOW THE DEFENDANT ANTHONY VALENTINE
AND RESPECTFULLY REQUEST THIS MOST HONORABLE
COURT, TO CONSTRUCT THIS MOTION LIBERALLY
PURSUANT TO KENNER VS. UNITED STATES,
THAT STATES THE COURT MAY CONSTRUCT IT AS
IT SEEMS FIT. (SEE UNITED STATES CRIM
LAW PROCEDURES) AS WELL AS, THE COURT...
THEY WOULD REVIEW THE FOLLOWING INFORMATION,
AND GRANT THIS MOTION AND FILE NOTICE
OF OBJECTION TO ALL PORTIONS INVOLVED
THAT THE DEFENDANT OBJECTS TO THE 4B1.1
ENHANCEMENT PREDICATE;

BACKGROUND

MR VALENTINE IS CHARGED WITH
A SINGLE 924(C) WHICH HE PLED TO
IN THIS COURT WITH ADVICE FROM
COUNSEL THAT ALL OTHER CHARGES
WOULD BE DISMISSED, HE WAS ADVISED
THAT HE Faced 5 YEARS TO LIFE FOR

COURT
SOUTH CAROLINA

THE OFFENCE, AFTER DOING SO IN OPEN COURT THE DEFENDANT RECEIVED HIS P.S.R. REPORT ON THE 21st OF MARCH 2018 AND WAS ADVISED HE WAS BEING CONSIDERED FOR A 4B1.1 ENHANCED SENTENCE, ON THE 28th OF MARCH 2018 HE WAS ADVISED BY A LAW FIRM DOING RESEARCH ON THE PRIOR CONVICTIONS, THAT ONE OF THE OFFENCES THAT WOULD BE USED BY THE GOVERNMENT WAS IN QUESTION, AND THAT HE SHOULD OBJECT TO THE COURT FOR A ALLOWED TIME FOR RESEARCH AND THAT HE HAD (14) DAYS TO OBJECT; WHEN HE CONTACTED HIS LAWYER(S) OFFICE, HE WAS TOLD THAT THE TIME PERIOD FOR OBJECTION WAS OVER, THIS WAS ALSO ON THE 28th OF MARCH, HIS LAWYER WAS ON VACATION AND HIS ASSISTANT ADVISED HIM THAT THEY WOULD ARGUE IT AT SENTENCING, MR VALENTINE WOULD RESPECTFULLY ASK THIS COURT TO GRANT A NOTICE OF OBJECTION TO ALL PARTIES

CERTIFICATE OF SERVICE

THE ABOVE INFORMATION IS BEING SIGNED AND FORWARDED THIS, 1st DAY OF APRIL, 2018 A TRUE COPY IS BEING SENT TO ALL PARTIES,

RESPECTFULLY SUBMITTED,

Anthony W

ANTHONY, VALENTINE

4 / 1 / 2018

DATE